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November 1, 2006

TO-008-06-07-008-DCN077

Mr. Dennis Matlock
On-Scene Coordinator
U.S. EPA - Region III
Wheeling Office - Methodist Bldg.
1060 Chapline Street
Wheeling, WV 26003-2995

Reference: Contract No. EP-S3-05-03; Work Assignment W13-008-06-07-014;
8th and Plutus Streets Pottery Site; Comments on Conceptual Remediation Plan
Changes.

Dear Mr. Matlock:

START has completed the draft review comments (included in this letter below in bulleted format) of the proposed Conceptual Remediation Plan changes, based on materials submitted to you by ENSR International - AECOM (on behalf of Newell Holdings Delaware, Inc.) during your site visit/meeting on October 4th, 2006.

Comments (organized by "Area"):

- **Area 1** - The proposed removal action for this area is adequate. However, future use will play an important role as the owner will have to agree that the only area adequately remediated for residential use will be Area 1. All fencing barriers erected during the Area 1 remediation must remain in place following completion of all phases of work associated with the consent order. Also, access onto and off of the site (especially vehicles) will have to be controlled to ensure that contamination does not leave the site, and to ensure that Area 1 does not become cross-contaminated following the planned remediation (during remediation of subsequent areas). Arrangements for access to the rental garages will need to be made available to tenants during the remediation of this area.
- **Area 2** - Regardless of the cleanup level, the proposed remediation (covering and regrading) appears to be an adequate remediation measure for this area. Since levels of lead and arsenic do not appear to be significantly impacting Marks Run in the current condition, a properly engineered cover and erosion control system in this area should be adequate, but a more specific description of the engineering involved in regrading and implementation of erosion control should be provided to EPA prior to work being conducted. The RP should take caution in the fact that the process of remediating this area could create a discharge of contamination into Marks Run (at the time remediation).

Also, due to the size of the site and the potential impact to Marks Run, a WV Storm Water Construction General Permit will need to be acquired prior to any work being conducted. This permit is required by the state to ensure that proper erosion control measures are utilized.

- **Area 3** - Regardless of the cleanup level, the proposed remediation (covering and regrading) appears to be an adequate remediation measure for this area. The extension of Area 3 along the northern border of the site helps to address an area of surficial contamination where the analytical data generated by the RP contractor indicated lead concentrations to be present in percent levels. Also, due to the presence of an oil/gas well in this area, the WVDEP Office of Oil and Gas should be notified to ensure compliance with regard to state regulations.
- **Area 4** - The proposed remediation appears to be adequate for this area.
- **Area 5** - The proposed remediation is unsatisfactory for this area. The contamination was not adequately delineated in either the vertical or horizontal dimensions during the ECS sampling. Analytical data from sample locations N-02 and O-02 indicated lead to be present in excess of 400, 1000, and 2100 ppm (N-02 and O-02 surface concentrations were indicated as 2,196 ppm and 2484 ppm, respectively). Other elevated lead concentrations were also indicated in this area. Several areas of surficial pottery debris are present in this area. It is recommended that this area (including along the riverbank where sample SDOH3 was collected) is cleared of all areas of visible surficial pottery debris, and that a small area remediation be used to address contamination along the topographic plane where the "02" grid samples were collected.
- **Area 6** - The proposed remediation appears to be adequate for this area.
- **Area 7** - The proposed fencing is adequate, however it is recommended that a layer of fill (preferably gravel or slag-like cover) be applied to this area. Also, spot remediation should be implemented in the area of sample locations G-08 and G-09 due to the elevated surface lead levels found at these locations (34,284 ppm and 5,760 ppm, respectively). This will allow for a deeper cover to be present in this area. Proper coordination with the DOT and/or USDOH will be necessary prior to the remediation of this area.
- **Area 8** - The proposed remediation appears to be adequate for this area, with the exception that it is recommended that the area in the vicinity of sample location C-08 receive spot remediation in addition to location D-09.
- **Area 9** - The proposed remediation appears to be adequate for this area. It is recommended that the WVDEP be contacted to ensure compliance with any state regulations that would be applicable to the planned re-alignment of the stream. Also, a USACE permit may be required to ensure compliance with Clean Water Act Section 404.

General Comments:

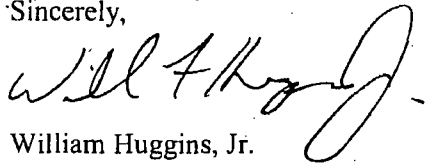
- It is recommended that a summary of proposed remediation be submitted that reflects the accepted requests pertaining to the above recommendations.

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- Particulate air monitoring may be warranted to due to the close proximity with residences and the elementary school/library area.
- "Clean" soil introduced onto the site needs to be established as such through analytical data. Sampling of this soil should include the same parameters used during the ECS (PCBs, arsenic, etc...). Also, where applicable the "clean" soil used should not be different in texture from that which is removed.
- As mentioned above, the RP should take caution in the fact that the process of remediation could create a discharge of contamination into Marks Run. Also, due to the size of the site and the potential impact to Marks Run, a WV Storm Water Construction General Permit will need to be to be acquired prior to any work being conducted. This permit is required by the state to ensure that proper erosion control measures are utilized.

If you have any questions or concerns regarding this document or this site, please feel free to contact me at (304)-230-1230.

Sincerely,



William Huggins, Jr.
Project Manager

cc: L. Burris/Central Files

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